

April 25, 2014

MEMORANDUM

SUBJECT: Financial Assurance Review
Financial Test / Corporate Guarantee

Guarantor: Occidental Petroleum Corporation
Los Angeles, CA 90024

Owner/operator: Occidental Chemical Corporation
Dallas, TX 75244

Facility: 6200 South Ridge Road
Wichita, KS 67215
EPA ID No. KSD 007482029

FROM: Michael Lancaster
Financial Analyst - SEE Grantee
AWMD/WEMM

TO: Brad Roberts
Project Manager
AWMD/WRAP

FINDINGS:

1. The amount of the current corrective action cost estimate (\$4,353,728) was adequately adjusted for inflation, as specified in 40 CFR §264.142(b).¹
2. The parent company, as the Guarantor, passes the Corporate Guarantee - Financial Test, Alternate II, as specified in 40 CFR §264.143(f).
3. It is recommended that the wording of both the CFO Letter and the written Corporate Guarantee be modified to include reference to corrective action.
4. Glenn Springs Holdings, a subsidiary of Occidental Petroleum Company, submitted the financial assurance documents. They request that the AWMD Director acknowledge the receipt of the documents in order to confirm Region 7's address. I have attached a sample draft of such a letter if you want to respond.

¹ Inflation Factor 1.015

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